### **QUESTIONS & ANSWERS**

#### The New MSB Registration Web site

1.) When will the new MSB Registration Web site be launched and why is it replacing the current MSB Registration List and paper acknowledgement letters?

FinCEN is launching the MSB Registration Web site the week of January 23, 2012, to improve the availability of MSB registration status data. The MSB Registration Web site will contain a list of entities that have registered as Money Services Businesses (MSBs) pursuant to the Bank Secrecy Act (BSA) regulations at 31 CFR 1022.380(a)-(f). As part of the Department of Treasury's initiative to go paperless, FinCEN will no longer be sending acknowledgement letters to MSBs. Currently, if an MSB does not receive an acknowledgement letter, or misplaces it, and requires proof of registration status, the MSB must request a paper copy of the letter from the Internal Revenue Service Enterprise Computing Center – Detroit (IRS ECC-D), which can take up to 60 days to process. The MSB Registration Web site will provide MSBs, banks, the public and others with improved access to MSB registration data in a more timely and more direct manner.

2.) I am an MSB and I have misplaced my acknowledgement letter. I will need proof of my registration status before the MSB Registration Web site is available. What should I do?

Between December 16, 2011, and the week of January 23, 2012, you will not be able to access confirmation of your MSB registration status; however, if your business appears on the MSB Registration List, you may use that listing as temporary confirmation of registration status. If you recently submitted your registration via the BSA E-Filing System, you may use the electronic acknowledgement of status as temporary proof of registration.

Please note that between December 16, 2011, and January 5, 2012, you will not receive an E-Filing acknowledgement of processed status of your Registration of Money Services

Business (RMSB) filing due to a data conversion period. If you electronically file your RMSB during this data conversion period, you will receive an electronic notice that you submitted your RMSB; however, you will not receive an acknowledgement of processed status until after January 5, 2012.

### 3.) I am a registered MSB. Do I still have to maintain copies of my registration form and past acknowledgement letters after the Web site is launched?

Yes. You must still maintain copies of your BSA records, including copies of previous registration forms and any acknowledgement letters received in the past, for a period of five years. After the MSB Registration Web site is launched, you should continue to maintain a record of your registration status information. You may print your registration information from the MSB Registration Web site. Depending upon your personal or business computer software or settings, you may also be able to save an electronic copy of your registration information.

# 4.) I am an MSB and I need to renew my registration by December 31, 2011. How will my registration information be affected by the new MSB Registration Web site?

If you electronically file your registration renewal before December 16, 2011, you will receive an electronic acknowledgement of processed status on the BSA E-Filing System and your registration information should appear on the MSB Registration Web site in January 2012. If you file your registration renewal between December 16, 2011, and January 5, 2012, you will receive a notice that you submitted your RMSB; however, you will not receive an acknowledgement of processed status until after January 5, 2012. If you file your renewal via paper in December, your registration information will most likely not appear on the MSB Registration Web site until the end of January 2012 or later due to the 60 day paper processing timeframe. Accordingly, FinCEN strongly encourages MSBs to electronically file their RMSB.

## 5.) I am an MSB and I will be registering for the first time in December. How will my registration information be affected by the new MSB Registration Web site?

We strongly encourage you to submit your registration online via the BSA E-Filing System. You can learn more about electronically filing your registration form by visiting the BSA E-Filing System: <a href="http://bsaefiling.fincen.treas.gov/main.html">http://bsaefiling.fincen.treas.gov/main.html</a>. You may also view a BSA E-filing Webinar about electronically filing your RMSB and other BSA forms: <a href="http://www.fincen.gov/financial\_institutions/msb/pdf/The-Benefits-of-BSA-E-Filing-In-Focus-MSB.pdf">http://www.fincen.gov/financial\_institutions/msb/pdf/The-Benefits-of-BSA-E-Filing-In-Focus-MSB.pdf</a>.

If you electronically file your initial registration before December 16, 2011, you will receive an electronic acknowledgement of processed status on the BSA E-Filing System.

If you file your initial registration between December 16, 2011, and January 5, 2012, you will receive a notice that you submitted your RMSB; however, you will not receive an acknowledgement of processed status until after January 5, 2012.

If you file via paper in December, your registration information may not appear on the MSB Registration Web site until the end of January 2012 or later due to the 60 day paper processing timeframe.

6.) I am an MSB. I have already registered, received an acknowledgement letter and am not due to renew my registration this year. How will my registration information be affected by the new MSB Registration Web site?

Your registration information will automatically appear on the new MSB Registration Web site in January 2012. You will be able to search for and print your registration information 24 hours a day, seven days a week.

7.) I am a bank representative and I want to confirm the registration status of an MSB customer who has not received, or has misplaced, an acknowledgement letter. How can I confirm MSB registration status during the month of December and until the launch of the new MSB Registration Web site in January 2012?

During the month of December and until the launch of the new MSB Registration Web site in January 2012, we encourage you to use alternative methods for temporarily determining registration status. Temporary alternative methods of determining registration status might include viewing an electronic submission of filing notice or acknowledgement of processed status from the BSA E-Filing System, or locating your customer's information on the MSB Registration List. After the new MSB Registration Web site is launched in January 2012, you and your customer will be able to conveniently view and print registration information 24 hours a day, seven days a week.

Please keep in mind that MSBs that are due to renew this year have until December 31, 2011, to submit their registration form. If they submit their form via the BSA E-Filing System, their information should appear on the MSB Registration Web site in January 2012. MSBs that submit their renewals via paper may not see their registration information on the MSB Registration Web site until the end of January 2012 or later due to the 60 day paper processing timeframe.